



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

2890 WOODBRIDGE AVENUE
EDISON, NEW JERSEY 08837

210800



By Facsimile and Regular U.S. Mail

October 17, 2000

Mr. Tim Francisco
Oxford Environmental
43 Route 46 East, Suite 702
Pine Brook, New Jersey 07058

Re: Cornell-Dubilier Electronics Site
Administrative Order CERCLA-02-2000-2005

Dear Mr. Francisco:

EPA hereby disapproved the Removal Action Work Plan for 126 Spicer Avenue dated August 2000 as amended by Removal Action Work Plan Addendum dated October 10, 2000. Comments provided by the U.S. Environmental Protection Agency (EPA) dated September 20, 2000 were not adequately addressed. As such, D. S. C. of Newark, Inc. is out of compliance with the referenced Order and is subject to stipulated penalties as of the date of this notice. EPA hereby requires D.S.C. of Newark, Inc. revise and resubmit the Work Plan in accordance with the following comments.

Work Plan

Comments provided herewith and in EPA's letter of September 20, 2000 are to be addressed in a revised Work Plan. An addendum to the Work Plan as provided previously is not acceptable. The Work Plan is to serve as a guide for how the work is to be conducted. Multiple documents could serve as a source of confusion in the future.

Section 3.2 - Proposed Verification Sample Collection

Any sample which is found to have a concentration of PCBs greater than 5 ppm when analyzed using Ensys field test kit is to be analyzed to determine if the total PCB concentration exceeds 50 ppm.

Area C exceeds 900 square feet in area. As such two bottom verification samples should be collected as opposed to one as proposed.

The depths at which verification samples are to be collected should be clarified. Bottom samples are to be collected from the 6" interval directly below the proposed excavation depth. Side wall samples are to be collected from the 6" interval above the proposed

~~excavation depth.~~ Side wall sampling will also include the collection of a sample from the 0-6" depth, in addition to the sample collected at the of the bottom of the excavation. The purpose of the 0-6" surface soil sample is to verify the horizontal limit of surficial contamination.

Section 4.5 - Soil Loading and Staging Procedures

It is understood from the Addendum to Section 4.5 that soil will not be stockpiled on-site.

Section 5.4 - Security

Continuous security service is to be provided during non-working hours while residents are temporarily relocated. The purpose of this service is to protect residents property while they are away from their home.

Section 6.2 - Disposal Requirements

Waste profiles and supporting documentation shall be submitted to EPA for review prior to submission to the proposed disposal facility. If waste profiles have already been submitted to the proposed disposal facility, they are to be provided to EPA immediately.

Sample waste manifests shall be submitted to EPA for review at least 5 days prior to shipment.

Appendix B - Health and Safety Plan

Section 6.2 - Physical Hazards

~~Provide a task specific hazard analysis.~~

Section 6.3.1 - Worker Chemical Hazard Assessment

The discussion of hazards associated with direct contact and ingestion (second bullet) needs to be clarified, there appears to be text missing. The following text appears in the Work Plan: "The sure of protective gloves and covering exposed skin, and through hand, face and arm washing prior to eating, drinking or smoking will minimize skin absorption and ingestion potentials."

Section 6.3.2 - Residential Exposure Chemical Hazard Assessment

OSHA PEL and ACGIH TLV apply to occupational exposure and may not be appropriate for residential exposure. NIOSH recommends an exposure level of 0.001mg/m³ for PCBs. In assessing exposure the more conservative NIOSH exposure limit should be used. The response in the Work Plan Addendum does not adequately address this issue.

Appendix C - Treatment and Disposal Facility Information

Provide an updated list of the off-site waste treatment and disposal facilities being considered for the removal action.

Appendix E - Restoration Plan

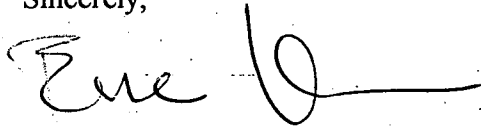
Provide a restoration landscape plan. This plan shall include an inventory of the plantings that may be disturbed or impacted as a result of planned remediation activities and specifications for landscape materials, replacement plantings and installation.

Appendix F - Schedule

Provide a revised project schedule for accomplishing the tasks specified in the Work Plan. The schedule should be referenced to EPA's approval of the Work Plan. That is, all tasks and milestones shall be expressed in terms of the number of days from EPA's approval of the Work Plan.

If you have any questions about the contents of this letter or the required work do not hesitate to call me at (732) 906-6991.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Wilson", followed by a long horizontal flourish.

Eric Wilson
On-Scene Coordinator

cc: Muthu Sundram, EPA
Daniel J. Sheridan, Spadaccini, Main & Sheridan

MODE = MEMORY TRANSMISSION

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FILE NO. = 245

NO.	COM	ABBR/NTWK	STATION NAME/ TELEPHONE NO.	PAGES	PRG.NO.	PROGRAM NAME
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-U.S. EPA REGION 2 REPP -

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FACSIMILE REQUEST AND COVER SHEET



**U.S. Environmental Protection Agency
Region 2
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TO: Daniel J. Sheridan, Esq.
Spadaccini, Main & Sheridan

FAX: (609) 912-~~4000~~ 0400

FROM: Eric Wilson

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FAX: (732) 906-6182

DATE: October 17, 2000

SUBJECT: Cornell-Dubilier Electronics Site

Number of Pages (including cover sheet): 4

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-U.S. EPA REGION 2 REPP -

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FACSIMILE REQUEST AND COVER SHEET



**U.S. Environmental Protection Agency
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2890 Woodbridge Avenue
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TO: Mr. Tim Francisco
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908 906 6182- *****



**U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION BRANCH
EDISON, NEW JERSEY**

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NUMBER OF PAGES TO FOLLOW: _____ + Cover